

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THE HOMESOURCE, CORP.,

Plaintiff,

v.

RETAILER WEB SERVICES, LLC,  
et al.,

Defendants.

Civil Action No.: 1:18-cv-11970

Hon. Eduardo C. Robreno (EDPA)

Hon. Karen M. Williams

Motion Day: March 16, 2020

**DEFENDANT RETAILER WEB SERVICES, LLC'S NOTICE OF MOTION FOR  
CONTEMPT AND SANCTIONS AGAINST PLAINTIFF**

**PLEASE TAKE NOTICE** that on March 16, 2020, or at an earlier date and time to be determined by the Court, undersigned counsel for Defendant Retailer Web Services, LLC, shall move before the Honorable Karen M. Williams, or any judge sitting in her stead in courtroom 5C of the U.S. District Court for the District of New Jersey, 4<sup>th</sup> & Cooper Streets, Camden, New Jersey, for an Order holding Plaintiff The HomeSource, Corp. in contempt and granting sanctions for violating this Court's October 16, 2019 Order [Dkt. 129] and failing to comply with its discovery obligations under Fed. R. Civ. P. 26 and 34, and

**PLEASE TAKE FURTHER NTOICE** that in support of this application, undersigned counsel will reply on the attached

Memorandum in Support, together with any exhibits attached thereto; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is simultaneously being filed herewith; and

**PLEASE TAKE FURTHER NOTICE** that a copy of this notice and motion were served via ECF on this date on all counsel of record.

Dated: February 10, 2020

Respectfully submitted,

/s/ Matthew A. Lipman  
Matthew A. Lipman, Esq.  
Monica T. Holland, Esq.  
Melissa A. Ruth, Esq.  
MCELROY, DEUTSCH, MULVANEY &  
CARPENTER, LLP  
1617 John F. Kennedy Boulevard,  
Suite 1500  
Philadelphia, PA 19103  
Tel.: (215) 557-2900  
mlipman@mdmc-law.com  
mholland@mdmc-law.com  
mruth@mdmc-law.com

Adam Wolek (*pro hac vice*)  
TAFT STETTINIUS & HOLLISTER LLP  
111 E. Wacker Drive, Suite 2800  
Chicago, IL 60601  
Tel.: (312) 836-4063  
Fax: (312) 966-8598  
awolek@taftlaw.com

William C. Wagner (*pro hac vice*)  
TAFT STETTINIUS & HOLLISTER LLP  
One Indiana Square, Suite 3500  
Indianapolis, IN 46204  
Tel.: (317) 713-3500  
Fax: (317) 713-3699  
wwagner@taftlaw.com

*Counsel for Defendant Retailer  
Web Services, LLC*

26632879